

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

STUDENTS FOR FAIR ADMISSIONS, INC.,

Plaintiff,

v.

PRESIDENT AND FELLOWS OF HARVARD  
COLLEGE (HARVARD CORPORATION),

Defendant.

Civil Action No. 1:14-cv-14176-ADB

**PLAINTIFF'S ASSENTED-TO MOTION TO FILE UNDER SEAL  
REPLY LETTER IN SUPPORT OF PLAINTIFF'S  
LETTER MOTION REGARDING SUMMARY SHEETS**

Pursuant to Local Rule 7.2 and this matter's Stipulated Protective Order (Dkt. No. 55), Plaintiff, Students for Fair Admissions, Inc. ("SFFA"), hereby brings this assented-to motion seeking an order to file under seal its reply letter in support of its letter motion regarding Defendant's summary sheets which was filed under seal on August 7, 2017. This reply letter will address certain assertions and arguments in Defendant's response letter which was filed under seal on August 24, 2017. Like the original letter motion, this reply will contain information that has been designated by Defendant as Confidential and/or Highly Confidential – Attorneys' Eyes Only pursuant to the Stipulated Protective Order. To comply with those designations, SFFA requests an order that allows the reply letter to be filed under seal in its entirety. Pursuant to Local Rule 7.1(a)(2), Defendant was aware of this motion and assents to it.

WHEREFORE, SFFA respectfully requests that the Court grant this motion and allow the reply letter to be filed under seal until further order of the Court and to be viewed only by the Judge, her clerk(s), and Court personnel.

Respectfully submitted,

By: /s/ Benjamin C. Caldwell  
Paul M. Sanford BBO #566318  
Benjamin C. Caldwell BBO #675061  
BURNS & LEVINSON LLP  
One Citizens Plaza, Suite 1100  
Providence, RI 02903  
Tel: 617-345-3000  
Fax: 617-345-3299  
psanford@burnslev.com  
bcaldwell@burnslev.com

Dated: August 25, 2017

William S. Consovoy  
Thomas R. McCarthy  
Michael H. Park  
J. Michael Connolly  
CONSOVOY MCCARTHY PARK PLLC  
3033 Wilson Boulevard, Suite 700  
Arlington, Virginia 22201  
Tel: 703-243-4923  
Fax: 703-243-4923  
will@consovoymccarthy.com  
tom@consovoymccarthy.com  
park@consovoymccarthy.com  
mike@consovoymccarthy.com

Patrick Strawbridge, BBO #678274  
CONSOVOY MCCARTHY PARK PLLC  
Ten Post Office Square  
8th Floor South PMB #706  
Boston, MA 02109  
Tel: 617-227-0548  
patrick@consovoymccarthy.com

*Counsel for Plaintiff Students for Fair  
Admissions, Inc.*

**CERTIFICATE OF CONFERENCE**

In accordance with Local Rules 7.1(a), I hereby certify that Defendant's counsel was made aware of this motion before it was filed and assents to the relief requested therein.

/s/ Benjamin C. Caldwell

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the CM/ECF system will be sent electronically to all counsel of record via the CM/ECF system.

/s/ Benjamin C. Caldwell

4832-9380-2318.1